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Attorneys for Defendant Manaflex LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CELLINK CORP.,

Plaintiff,

v.

MANAFLEX LLC,

Defendant.

Case No. 23-cv-4231-HSG

**STIPULATED REQUEST FOR ORDER
EXTENDING TIME FOR CELLINK
CORP. TO RESPOND TO MANAFLEX
LLC'S COUNTERCLAIMS AND
ORDER**

[Civil L.R. 6-2]

Demand For Jury Trial

Complaint Filed: August 18, 2023

STIPULATED REQUEST FOR
ORDER EXTENDING TIME TO
RESPOND TO COUNTERCLAIMS
CASE NO. 23-CV-4231-HSG

1 Plaintiff Cellink Corp. (“Plaintiff”) and Defendant Manaflex LLC (“Defendant”)
2 (together, the “Parties”) hereby stipulate under Civil Local Rule 6-2(a) to request an order
3 extending the deadline for Plaintiff to respond to Defendant’s Counterclaims (ECF No. 37) or
4 amended counterclaims from June 11, 2024 to July 9, 2024.

5 The requested extension is warranted to promote judicial efficiency. As it currently stands,
6 CelLink’s answer to Manaflex’s original counterclaims is due June 11, 2024, but Manaflex may
7 choose to file amended counterclaims pursuant to the Court’s Order (ECF No. 70) on June 18,
8 2024, mooted CelLink’s answer that would be filed June 11. Declaration of Elaine Ke (“Ke
9 Decl.”) ¶ 4.

10 There have been three previous extension of time in this case:

11 (1) a stipulated extension of time to respond to the complaint that was filed on
12 September 11, 2023, and granted on September 12, 2023. Ke Decl. ¶ 5.

13 (2) a stipulated extension of time for the Parties to file a Joint Case Management
14 Statement and selecting an ADR process that was filed on November 7, 2023, and granted on
15 November 8, 2023. Ke Decl. ¶ 5.

16 (3) a stipulated extension of time for CelLink to respond to Manaflex’s counterclaims that
17 was filed on November 27, 2023, and granted on November 28, 2023. Ke Decl. ¶ 5.

18 The Court has not yet entered a scheduling order in this case. Thus, the extension of time
19 requested here would have no effect on any schedule for the case. Ke Decl. ¶ 6.

1 Dated: June 12, 2024

By: /s/ Elaine Ke

Clement S. Roberts
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Alyssa Caridis
Raghav Krishnapriyan
Parth Sagdeo
Elaine Ke

ORRICK, HERRINGTON & SUTCLIFFE LLP

Attorneys for Plaintiff CelLink Corp.

8 Dated: June 12, 2024

By: /s/ Alison Anderson

Alison Lynn Anderson
Eric Maurer
Beko Osiris Ra Reblitz-Richardson

BOIES SCHILLER FLEXNER LLP

Attorneys for Defendant Manaflex LLC

ECF ATTESTATION

I, Elaine Ke, am the ECF User whose ID and password are being used to file this Stipulated Request for Order Extending Time For Cellink Corp. To Respond To Manaflex LLC's Counterclaims and [Proposed] Order. In compliance with Civil Local Rule 5-1, I hereby attest that Alison Anderson, counsel for Manaflex LLC, has concurred in this filing.


Dated: June 12, 2024

By: /s/ Elaine Ke

Elaine Ke

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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5 Dated: 6/12/2024
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Haywood S. Gilliam, Jr.
United States District Judge